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COOLIT SYSTEMS, INC. and Defendants  
CORSAIR GAMING, INC. and CORSAIR  
MEMORY, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ASETEK DANMARK A/S,  
  
Plaintiff and  
Counter-defendant,

v.

COOLIT SYSTEMS, INC.,  
  
Defendant and  
Counter-claimant,  
  
CORSAIR GAMING, INC. and CORSAIR  
MEMORY, INC.,  
  
Defendants.

Case No. 3:19-cv-00410-EMC

**REPLY DECLARATION OF REUBEN H.  
CHEN IN SUPPORT OF DEFENDANTS'  
REPLY IN SUPPORT OF THEIR MOTION TO  
STRIKE EXHIBIT 275**

1 I, Reuben H. Chen, do hereby declare as follows:

2 1. I am an attorney licensed to practice before this Court and all courts of the State of  
3 California, and am a partner with Cooley LLP, counsel for Defendant and Counter-claimant CoolIT  
4 Systems, Inc. (“CoolIT”), Defendant Corsair Gaming, Inc., and Defendant Corsair Memory, Inc.  
5 (collectively, “Defendants”) in the above-entitled action. I submit this declaration in support of  
6 Defendants’ Reply in Support of Their Motion to Strike Exhibit 275. The matters stated herein are  
7 based upon my personal knowledge, and if called as a witness, I would testify as to the following  
8 statements.

9 2. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from Plaintiff Asetek  
10 Danmark A/S’s Objections and Responses to Defendant CoolIT Systems, Inc.’s First Set of Requests  
11 for Production of Documents and Things to Plaintiff Asetek Danmark A/S (Nos. 1-98), dated August  
12 8, 2019.

13 3. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts of the deposition  
14 transcript of Himanshu Pokharnam, Ph.D., conducted January 10, 2022, including his deposition  
15 errata. Relevant portions of the deposition transcript have been highlighted for the convenience of the  
16 Court.

17 4. Attached hereto as **Exhibit 11** is a true and correct copy of a document marked as  
18 Exhibit 275 at the deposition of David Tuckerman, Ph.D., conducted on December 20, 2021.

19 5. Attached hereto as **Exhibit 12** is a true and correct copy of Declaration of Himanshu  
20 Pokharna, Ph.D., dated April 21, 2022.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
22 and correct to the best of my knowledge.

23 EXECUTED at Sunnyvale, California on this 21st day of April, 2022.

24  
25 /s/Reuben H. Chen  
26 Reuben H. Chen  
27